

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

CRAIG CUNNINGHAM,

Plaintiff,

v.

**ENAGIC USA, INC.; PETER POLSELLI;
TERRY COLLINS; RICK FREEMAN;
ANGELINA LINER; CHRISTIAN KINNEY;
THE 7 FIGURE WEALTH CORPORATION;
CORAZON MANAGEMENT GROUP, INC.;
JEFFREY HOWARD; SUSIE TREMBLAY-
BROWN; PETER WOLFING; MULTIPLEX
SYSTEMS, INC.; BRIAN KAPLAN; WALTER
PETERSON; MY MINDS EYE, LLC;
800LINK, INC.; SCOTT BIEL; JERRY
MAURER; DAVE HILL AKA DAVE ALLEN
AKA DAVE ALEEN; and JOHN AND JANE
DOE'S 1-10,**

Defendants.

Case No. 3:15-cv-00847

**ANSWER OF DEFENDANTS SCOTT BIEL AND 800 LINK TO PLAINTIFF'S THIRD
AMENDED COMPLAINT**

COMES NOW the Defendants, 800 Link, Inc. and Scott Biel, by and through counsel, and herein responds to the Plaintiff's Third Amended Complaint as follows:

1. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 1 of the plaintiff's third amended complaint.

2. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 2 of the plaintiff's third amended complaint.

3. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 3 of the plaintiff's third amended complaint.

4. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 4 of the plaintiff's third amended complaint.

5. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 5 of the plaintiff's third amended complaint.

6. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 6 of the plaintiff's third amended complaint.

7. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 7 of the plaintiff's third amended complaint.

8. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 8 of the plaintiff's third amended complaint.

9. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 9 of the plaintiff's third amended complaint.

10. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 10 of the plaintiff's third amended complaint.

11. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 11 of the plaintiff's third amended complaint.

12. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 12 of the plaintiff's third amended complaint.

13. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 13 of the plaintiff's third amended complaint.

14. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 14 of the plaintiff's third amended complaint.

15. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 15 of the plaintiff's third amended complaint.

16. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 16 of the plaintiff's third amended complaint.

17. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 17 of the plaintiff's third amended complaint.

18. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 18 of the plaintiff's third amended complaint.

19. Admitted.

20. Admitted.

21. These defendants lack sufficient knowledge or information to either admit or deny the allegations made in Paragraph 21 of the plaintiff's third amended complaint.

22. These defendants deny participating in any acts of breach or entering into any contract breached in this county or otherwise.

23. These defendants deny making any phone calls to the plaintiff.

24. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 24 however they are denied as to these defendants.

25. These defendants can neither admit nor deny the allegations contained in Paragraph 25 as alleged against the other defendants however they are denied as to these defendants.

26. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 26 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

27. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 27 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

28. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 28 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

29. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 29 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

30. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 30 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

31. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 31 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

32. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 32 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

33. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 33 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

34. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 34 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

35. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 35 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

36. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 36 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

37. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 37 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

38. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 38 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

39. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 39 as they are directed at other defendants, however they are denied to the extent directed at these defendants.

40. These defendants lack sufficient knowledge to admit or deny the allegations contained in Paragraph 40 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

41. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 41 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

42. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 42 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

43. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 43 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

44. These defendants lack sufficient knowledge to either admit or deny the allegations contained in Paragraph 44 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

45. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 45 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

46. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 46 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

47. The allegations in Paragraph 47 are denied as 800 Links never made any calls to the Plaintiff.

48. These defendants lack sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 48 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

49. These defendants lack sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 49 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

50. This defendant lacks sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 50 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

51. This defendant lacks sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 51 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

52. It is denied that any phone calls were made to the plaintiff by 800 Link, Inc. This defendant lacks sufficient knowledge or information to admit or deny the remaining allegations of Paragraph 52 of the plaintiff's third amended complaint.

53. Paragraph 53 does not include an allegation to which a response is required. However it is denied that these defendants made any phone calls to the plaintiff.

54. This defendant lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 54 of the plaintiff's third amended complaint. It is denied that these defendants made any calls to the plaintiff.

55. This defendant lacks sufficient knowledge or information to admit or deny whether the phone calls occurred as alleged following Paragraph 55 of the plaintiff's third amended complaint. These defendants deny making any of the phone calls to the plaintiff.

However some of the numbers alleged to have placed calls to the plaintiff appear to be or at one time were numbers issued to 800Link subscribers. If any inappropriate calls were made to the plaintiff and the caller ID displayed an 800Link subscriber number there were not made by or for 800Link and were likely made by or on behalf of an 800Link subscriber.

56. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 56 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

57. This defendant lacks knowledge sufficient to either admit or deny the allegations contained in Paragraph 57 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

58. This defendant lacks knowledge sufficient to either admit or deny the allegations contained in Paragraph 58 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

59. This defendant lacks knowledge sufficient to either admit or deny the allegations contained in Paragraph 59 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

60. This defendant lacks knowledge sufficient to either admit or deny the allegations contained in Paragraph 60 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

61. This defendant lacks knowledge sufficient to either admit or deny the allegations contained in Paragraph 61 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

62. Paragraph 62 appears to state a legal conclusion to which these defendants are not required to respond.

63. These defendants lack sufficient knowledge or information to either admit or deny the allegations contained in Paragraph 63 to the extent they are directed at other defendants however to the extent they are directed at these defendants they are denied.

64. Paragraph 64 appears to state a legal conclusion to which these defendants are not required to respond.

65. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 65 of the plaintiff's third amended complaint however they are denied to the extent directed at these defendants.

66. Paragraph 66 appears to state a legal conclusion to which these defendants are not required to respond.

67. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 67 however they are denied to the extent directed at these defendants.

68. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 68 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

69. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 69 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

70. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 70 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

71. Paragraph 71 appears to state a legal conclusion to which these defendants are not required to respond.

72. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 72 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

73. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 73 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

74. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 74 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

75. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 75 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

76. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 76 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

77. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 77 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

78. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 78 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

79. Paragraph 79 appears to state legal conclusions to which these defendants are not required to respond.

80. This defendant lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 80, however they are denied to the extent directed at these defendants.

81. This defendant lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 81, however they are denied to the extent directed at these defendants.

82. This defendant lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 82, however they are denied to the extent directed at these defendants.

83. This defendant lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 83, however they are denied to the extent directed at these defendants.

84. This defendant lacks sufficient knowledge or information to admit or deny the allegations contained in Paragraph 84, however they are denied to the extent directed at these defendants.

85. These defendants lack sufficient knowledge or information to admit or deny the allegations as contained in Paragraph 85 of the plaintiff's third amended complaint however it is denied that either of these defendants had any relationship with Enagic.

86. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 86 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

87. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 87 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

88. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 88 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

89. Paragraph 89 appears to state legal conclusions to which this defendant is not required to respond.

90. Paragraph 90 appears to state a legal conclusion to which this defendant is not required to respond, however it is denied to the extent directed at these defendants.

91. These defendants deny placing any phone calls to the plaintiff. These defendants lack sufficient knowledge or information to admit or deny the remaining allegations contained Paragraph 91 of the plaintiff's third amended complaint.

92. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 92 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

93. These defendants lack sufficient knowledge to admit or deny the allegations contained in Paragraph 93 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

94. These defendants lack sufficient knowledge to admit or deny the allegations contained in Paragraph 94 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

95. These defendants lack sufficient knowledge to admit or deny the allegations contained in Paragraph 95 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

96. Paragraph 96 appears to state a legal conclusion to which these defendants are not required to respond.

97. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 97 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

98. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 98 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

99. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 99 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

100. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 100 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

101. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 101 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

102. Denied as to these defendants.

103. Denied as to these defendants.

104. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 104 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

105. Paragraph 105 appears to state a legal conclusion to which this defendant is not required to respond, however it is denied to the extent directed at these defendants.

106. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 106 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

107. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 107 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

108. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 108 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

109. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 109 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

110. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 110 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

111. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 111 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

112. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 112 of the plaintiff's third amended complaint, however the reference to setting up an "800Link voicemail account for retrieving leads" may be accurate as 800Link operates a business where it provides phone numbers for receiving calls and voice messages for incoming callers. 800Link made no outgoing calls to the plaintiff.

113. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 113 of the plaintiff's third amended complaint, however 800Link is not a voice broadcasting company or automated dialing system and made no outgoing calls to the plaintiff. 800Link does not sell minutes or participate in automated dialing in any way.

114. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 114 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

115. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 115 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

116. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 116 of the plaintiff's third amended complaint, however it is denied that 800Link is a voice broadcasting company and denied that these defendants made any calls to the plaintiff.

117. It is denied that 800Link placed or worked with automated call software to place any calls to the plaintiff and thus it did not alter or dictate caller ID information. Entities making calls may alter their outgoing calls to reflect an 800Link number in the event the individual receiving the call wants to return it, as 800Link offers voice recordings and voicemail services for incoming calls. These defendants made no phone calls to the plaintiff.

118. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 118 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

119. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 119 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

120. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 120 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

121. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 121 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

122. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 122 of the plaintiff's third amended complaint, while they do seem unlikely based on the previous allegations in the complaint. Regardless, they are denied to the extent directed at these defendants.

123. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 123 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

124. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 124 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

125. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 125 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

126. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 126 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

127. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 127 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

128. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 128 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

129. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 129 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

130. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 130 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

131. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 131 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

132. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 132 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

134. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 134 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

135. These defendants incorporate by reference their responses to the prior numbered paragraphs.

136. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 136 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

137. These defendants incorporate by reference their responses to the prior numbered paragraphs.

138. These defendants lack sufficient knowledge or information to admit or deny the allegations contained in Paragraph 138 of the plaintiff's third amended complaint, however they are denied to the extent directed at these defendants.

139. All allegations in the third amended complaint not heretofore admitted, denied or explained are now generally denied as if specifically denied.

AFFIRMATIVE DEFENSES

140. The Plaintiff's third amended complaint fails to state a claim upon which relief can be granted.

141. Upon information and belief the plaintiff has failed to join indispensable or potentially at fault parties to this action. Based on the complaint, the plaintiff alleges inappropriately receiving automated telephone calls and mistakenly identified 800Link as one of the sources of those calls. 800Link is not a voice broadcasting company and does not possess the capacity to place automated calls in the manner described by the plaintiff. If the allegations in the plaintiff's complaint are true then the plaintiff has failed to add as parties the voice broadcasting entities actually making calls to him.

142. These defendants plead the doctrine of waiver as based on the plaintiff's complaint it appears he sought out these phone calls, texts, conference calls and communications for the purpose of pursuing his own gains. The allegations of numerous calls from numerous individuals as well as the plaintiff's litigious history with these types of claims suggests he has taken action to seek out the phone calls he takes issue with.

143. These defendants plead the doctrine of unclean hands. The plaintiff is the cause of his receiving the calls he complains of. Based on the allegations of the complaint and the plaintiff's history of pursuing litigation regarding similar claims it appears the plaintiff has taken action to seek out phone calls he now complains of, purely for the purpose of bring suits such as this. The plaintiff is not who the legislature had in mind to protect when drafting the TCPA.

That law was drafted to protect people who received calls, as defined in the statute, due to no fault of their own and against their wishes.

Wherefore, having fully answered the plaintiff's third amended complaint these defendants ask and pray that the plaintiff's complaint be dismissed with costs assed to the plaintiff.

Respectfully submitted,

SPICER RUDSTROM PLLC

/s/ Darrick L. O'Dell

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Attorney for Defendants Scott Biel and 800Link

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via the Court's ECF notice system and via regular US Mail, postage prepaid and properly addressed, to:

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this 7th day of January, 2015.

/s/ Darrick L. O'Dell
Darrick L. O'Dell